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8
9 UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

10 BRANDI PASSANTE

11 Plaintiffs,

Case No.: SACV12-01866JVA (ANx)

12 vs.

13 HUNTER MOORE, AN INDIVIDUAL, AND
14 DOES 1-25,

DECLARATION OF BRANDI PASSANTE
CONCERNING CONTINUED POSTS FROM
HUNTER MOORE AND DAMAGES
RESULTING THEREFROM

15 Defendants.
16

DECLARATION OF BRANDI PASSANTE

17 I, Brandi Passante, hereby declare under the penalties of perjury under the laws of
18 the United States of America, that the following is true and correct:

- 19 1. I have personal knowledge of the matters stated herein, and if called upon to testify I
20 could and would do so competently.
- 21 2. I am the Plaintiff in the above referenced case
- 22 3. I am informed and believe that on October 26, 2012 the Court Granted a Temporary
23 Restraining Order requiring the Defendant in this case to remove a video and images he alleged
24 to be me from his websites.

1 4. Since this TRO was issued, I have received posts from Defendants internet
2 "followers" commenting on the content of the pornographic video.

3 5. These posts to my Twitter account have ranged from invitations to reenact the video
4 with the sender, to compliments on the actress' body, to insults and people calling me a whore.

5 6. There have also been damaging references to the TV show I appear on, calling it
6 "Whorage Wars" instead of "Storage Wars."

7 7. I am aware that Moore has also been sent to me, through my counsel, a photograph of
8 his penis in an aroused state sent in a harassing nature.

9 8. Consequently, I have had to block the Defendant from my Twitter account and I have
10 stopped using social media all together, which prevents me from maintaining contact with my
11 fan base.

12 9. The online-insults, references to "Whorage Wars," and my inability to interact with
13 my fan base all damage my popularity with my fans and my professional reputation.

14 10. Because Defendant was evasive and difficult to serve I have incurred a great deal of
15 costs in legal and service fees.

16 11. I am informed and believe that on November 9, 2012 and again on November 12,
17 2012 my attorney noticed Defendant of the continued TRO and the hearing on the preliminary
18 injunction and impoundment via email.

19 12. Shortly after notice was sent to Defendant, on November 13, 2012 I received an email
20 notification that my Twitter account had been tagged in a post. The post was from Defendant
21 referring to a time when he falsely claims I had sex with him and the video which is the subject
22 of the TRO. A true and correct copy of the post is attached hereto as Exhibit A.

23

24

1 13. On November 13, 2012 I received notification of a second Twitter post, also from
2 Defendant referring to my breasts in an unflattering and sexual manner. A true and correct copy
3 of the post is attached as Exhibit B.

4 Executed November 15, 2012 in Orange County, California.

5
6 
7 Brandi Passante

EXHIBIT A

-

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-

-

Username or email

Password



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Alignment

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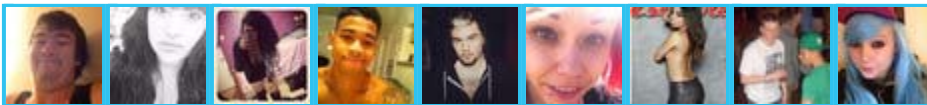


[Hunter Moore](#)@Huntermoore16h

hey @Brandipassante remember when i fucked you in long beach and you told me not to post your video because you trusted me

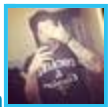
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- 10 Retweets
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2:20 AM - 13 Nov 12 ·

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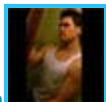


16h [Hunter Moore](#)@Huntermoore

hey @Brandipassante remember when i fucked you in long beach and you told me not to post your video because you trusted me

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- [Reply](#)
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16h [Sawyer Fulks@Sawyer666](#)

[@Huntermoore](#) You need to get a life and grow up, buddy.

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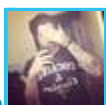


16h [Jay @jayythagod](#)

[@Huntermoore](#) [@brandipassante](#) whorage wars

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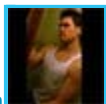


16h [Hunter Moore@Huntermoore](#)

but you still follow me. trick shit nigga. you're just helping paying the bills fool. [@Sawyer666](#)

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16h [Sawyer Fulks@Sawyer666](#)

[@Huntermoore](#) I'm actually not.

EXHIBIT B

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Search query

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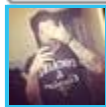
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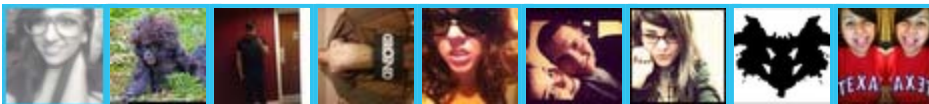


Hunter Moore [@Huntermoore](#) 16h

i can't wait to fuck [@Brandipassante](#) again. those titties were fat as fuck

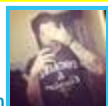
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- 5 Retweets
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2:19 AM - 13 Nov 12 ·

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16h **Hunter Moore** [@Huntermoore](#)

i can't wait to fuck [@Brandipassante](#) again. those titties were fat as fuck

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16h [Nick @Nick_Agr5](#)

[@Huntermoore](#) [@Brandipassante](#) I never saw the video anywhere

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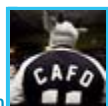


16h [Steven Ayee@mockwrekz](#)

[@Huntermoore](#) [@Brandipassante](#) damn now I know who she is.. good shit lol pics or it wasnt true!
Lol

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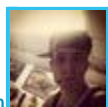


12h [Randy Joe Luna@Randyjoeluna](#)

[@Huntermoore](#) [@brandipassante](#) where that video at nigga!?

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12h [C-BLUNT@officialcblunt](#)

[@Huntermoore](#) [@Brandipassante](#) yuuuuup!!!!

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